

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

No. 15-cr-20351

v.

Hon. Victoria A. Roberts

D-1 SHAHID TAHIR,

Defendant.

AMENDED DISCOVERY NOTICE

1. The attorney for the government knows that the defendant made
 - a. relevant written or recorded statements (including grand jury testimony) and/or
 - b. relevant oral statements made in response to interrogation, whether before or after arrest, by a person then known to the defendant to be a government agent, whether or not the statement is included in a written record, as follows:

Date	Agent/Agency	Type	Not Applicable __
09/11/2012	Brian Fairweather, FBI Gary Francis, FBI	FD-302a	
Multiple dates	FBI and HHS-OIG	Recorded statements made during interactions with confidential sources	

2. The attorney for the government knows that defendant has a prior criminal record:
NO X YES
3. The following books, papers, documents, photographs and tangible objects are within the possession, custody or control of the government and are

intended to be used as evidence in chief at trial, are known to the government to be material to the preparation of the defense, or were obtained from or belong to the defendant:

- Documents and billing data provided by Medicare;
- Bank records;
- Travel records;
- Items seized during the execution of search warrants at the following locations:
 - At Home Network, Inc., 20282 and 20284 Middlebelt Road, Livonia, Michigan
 - Waseem Alam, M.D., P.C., 43344 Woodward Avenue, Bloomfield Hills, Michigan
 - Woodward Urgent Care PLLC, 43344 Woodward Avenue, Bloomfield Hills, Michigan
 - 3840 Manchester Court, Bloomfield Hills, Michigan
 - 92 Millstone Drive, Troy, Michigan
 - 6701 Stonebridge Court, West Bloomfield, Michigan
 - Hatem M. Ataya, M.D., P.C., 971 Baldwin Street, Lapeer, Michigan
 - Hatem M. Ataya, M.D., P.C., 3400 Fleckenstein Drive, Flint, Michigan
 - Hatem M. Ataya, M.D., P.C., 3390 North State Road, Davison, Michigan
 - Hatem M. Ataya, M.D., P.C., 5097 Miller Road, Flint, Michigan
 - 2591 South Shore Drive, Flushing, Michigan
 - 3390 North State Road, Suite C, Davison, Michigan
 - Storage room within 3390 North State Road, Davison, Michigan
 - Black Mercedes Benz sedan with Michigan license plate number CJZ2104
 - gotherapy@yahoo.com
 - nasima.ahmed0@gmail.com
 - shahidtahir@comcast.net
 - House Calls Physicians, PLLC, 6842 Park Avenue, Allen Park, Michigan
 - Advanced Medical Billing Professionals, LLC, 6842 Park Avenue, Suite 3, Allen Park, Michigan
 - Home Physician Services, P.C., 17520 West 12 Mile

Road, Suites 109 and 111

including patient files, patient charts, and other medical records, payroll information, personal financial documents, checks, miscellaneous business information binders, employee verification files, corporate documents, activity logs, faxes, contact lists, prescriptions and prescription records, business records, employee files, correspondence, invoices, electronic media and storage devices, accounting records, billing records, and other miscellaneous items and documents;

- Photographs of premises taken during execution of search warrants.

4. Results or reports of the following physical or mental examinations, or scientific tests or experiments, are within the possession, custody or control of the government, and are either intended to be used as evidence in chief at trial or are known to the government to be material to the preparation of the defense: N/A
5. The government intends to introduce at trial testimony from one or more experts in the following areas of expertise: N/A at this time
6. The government may introduce evidence obtained from execution of the following search warrants:

Date(s)	Address/Location	Docket Number(s)
06/16/2015	At Home Network, Inc., 20282 and 20284 Middlebelt Road, Livonia, Michigan	15-mc-50783-D
06/16/2015	Waseem Alam, M.D., P.C., 43344 Woodward Avenue, Bloomfield Hills, Michigan	15-mc-50783-E
06/16/2015	Woodward Urgent Care PLLC, 43344 Woodward Avenue, Bloomfield Hills, Michigan	15-mc-50783-F
06/16/2015	3840 Manchester Court, Bloomfield Hills, Michigan	15-mc-50783-G

06/16/2015	92 Millstone Drive, Troy, Michigan	15-mc-50783-H
06/16/2015	6701 Stonebridge Court, West Bloomfield, Michigan	15-mc-50783-I
06/02/2015	Hatem M. Ataya, M.D., P.C., 971 Baldwin Street, Lapeer, Michigan	15-mc-50777
06/02/2015	Hatem M. Ataya, M.D., P.C., 3400 Fleckenstein Drive, Flint, Michigan	15-mc-50777-A
06/02/2015	Hatem M. Ataya, M.D., P.C., 3390 North State Road, Davison, Michigan	15-mc-50777-B
06/02/2015	Hatem M. Ataya, M.D., P.C., 5097 Miller Road, Flint, Michigan	15-mc-50777-C
06/02/2015	2591 South Shore Drive, Flushing, Michigan	15-mc-50777-D
06/02/2015	3390 North State Road, Suite C, Davison, Michigan	15-mc-50783
06/02/2015	Storage room within 3390 North State Road, Davison, Michigan	15-mc-50783-A
06/02/2015	Black Mercedes Benz sedan with Michigan license plate number CJZ2104	15-mc-50783-B
01/16/2015	Waseem Alam, M.D., P.C., 43344 Woodward Avenue, Bloomfield Hills, Michigan	14-mc-51592-C
11/20/2014	gotherapy@yahoo.com	14-mc-51592

11/20/2014	nasima.ahmed0@gmail.com	14-mc-51592-A
11/20/2014	shahidtahir@comcast.net	14-mc-51592-B
09/20/2012	House Calls Physicians, PLLC, 6842 Park Avenue, Allen Park, Michigan	12-mc-51300-B
09/20/2012	Advanced Medical Billing Professionals, LLC, 6842 Park Avenue, Suite 3, Allen Park, Michigan	12-mc-51300-D
09/11/2012	Home Physician Services, P.C., 17520 West 12 Mile Road, Suites 109 and 111, Southfield, Michigan	12-mc-50403-B

7. The government may introduce evidence obtained through wiretaps or other electronic surveillance:

Type: (wiretap, bug, etc.) Docket Number(s) Not Applicable ☐

Consensual recordings on N/A
multiple dates

8. The government intends to offer evidence under Rule 404(b), Fed. R. Evid.
Yes ☐ No ☐ Unsure ☒

9. The attorney for the government is aware of the obligations imposed by Brady v. Maryland, 373 U.S. 83 (1963), and its progeny and will comply with their obligation to provide defense counsel with exculpatory evidence that is material to either guilt or to punishment in time for effective use at trial.

If the government discovers additional information of the type described in Paragraphs One through Nine, it will advise defense counsel in writing.

Upon specific request of the defendant, the government will make available

for inspection or copying the items described in Paragraphs One, Three, and Four; will furnish the record referred to in Paragraph Two; will provide a summary (which will include the witnesses' qualifications, opinions, and the bases and reasons for the opinions) of the anticipated testimony described in Paragraph Five; and will provide notice of the general nature of the evidence referred to in Paragraph Eight. The government's compliance with any specific request will trigger the defendant's duty to provide the reciprocal discovery denoted in Fed. R. Crim. P. 16(b)(1)(A)-(C). If the defendant makes a general request for discovery the government will construe it as a request for each item described in Fed. R. Crim. P. 16(a)(1)(A)-(E). The government's compliance with the defendant's general request will trigger the defendant's duty to provide reciprocal discovery of each item specified in Fed. R. Crim. P. 16(b)(1)(A)-(C).

Barbara L. McQuade
United States Attorney

s/Matthew C. Thuesen
Matthew C. Thuesen
Trial Attorney
U.S. Department of Justice
Criminal Division, Fraud Section
1400 New York Ave., N.W.
Bond Building, Fourth Floor
Washington, D.C. 20005
Phone: 202-679-4187
E-Mail: matthew.thuesen@usdoj.gov

Dated: June 25, 2015

CERTIFICATE OF SERVICE

I hereby certify that, on June 25, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF, which will send notification of such filing to the following:

Harold Z. Gurewitz
Gurewitz & Raben, PLC
333 W. Fort Street Suite 1400
Detroit, MI 48226
Counsel for Defendant Shahid Tahir

s/Matthew C. Thuesen
Matthew C. Thuesen
Trial Attorney
U.S. Department of Justice
Criminal Division, Fraud Section
1400 New York Ave., N.W.
Bond Building, Fourth Floor
Washington, D.C. 20005
Phone: 202-679-4187
E-Mail: matthew.thuesen@usdoj.gov